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December 30, 2021

**DELIVERED VIA ECF AND EMAIL**

The Honorable Katherine Polk Failla  
Failla\_NYSDChambers@nysd.uscourts.gov

**MEMO ENDORSED**

**Case Title:** *Gold Value International Textile, Inc., d/b/a Fiesta  
Fabric v. The Levy Group, Inc. et al.; 1:21-cv-06772-KPF*  
**Re:** **Request for Adjournment of Initial Pretrial Conference  
and Extension of Defendants' Deadline to Answer**

Your Honor:

This office represents Plaintiff Gold Value International Textile, Inc. We write, together with Defendants The Levy Group and Nordstrom Inc., to respectfully request an adjournment of the conference currently scheduled for January 5, 2022 at 2:30 pm and an extension for Defendants' deadline to answer, which is also currently set for January 5, 2022. This is the third request for an extension of Defendants' answer deadline, and the first two requests were previously granted. (Dkts. #25, #30.) The reason for these requests is that although the parties have entered into a protective order and exchanged certain information to facilitate settlement discussions, additional material is still necessary to further settlement negotiations. The parties are in the process of exchanging this material but need additional time due to the holidays. The parties anticipate that there will be no further extension requests for Defendants' deadline to answer or for the initial pretrial conference.

We thank Your Honor for your time and consideration of this request.

Respectfully submitted,

By: /s/ Laura M. Zaharia  
Scott Alan Burroughs  
Laura M. Zaharia  
DONIGER / BURROUGHS  
For the Plaintiff

By: /s/ Theodore Massoud Sabety  
Theodore Massoud Sabety  
SABETY + ASSOCIATES PLLC  
For the Defendants The Levy Group, Inc. and Nordstrom, Inc.

Application GRANTED.

The initial pretrial conference in this matter is hereby ADJOURNED to **February 1, 2022, at 10:00 a.m.**

Defendants The Levy Group and Nordstrom Inc. shall file their responses to the Complaint on or before **January 27, 2022.**

The Clerk of Court is directed to terminate the motion at docket entry 31.

Dated: January 3, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE